

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MONSANTO COMPANY and )  
MONSANTO TECHNOLOGY LLC, )

Plaintiffs, )

vs. )

Case No. 4:09-CV-00686-ERW

E.I. DUPONT DE NEMOURS AND )  
COMPANY and PIONEER HI-BRED )  
INTERNATIONAL, INC., )

Defendants. )

**DUPONT’S MOTION FOR LEAVE TO FILE UN-REDACTED  
MEMORANDUM IN SUPPORT AND EXHIBITS THERETO UNDER SEAL**

Pursuant to E.D. Mo. L. R. 13.05(A), E.I. du Pont de Nemours and Company and Pioneer Hi-Bred International, Inc. (collectively “DuPont”) respectfully move the Court for an order allowing DuPont to file a complete, unredacted copy of the Memorandum in Support of DuPont’s Second Motion to Compel, and an Appendix and Exhibits A-P thereto, under seal. The basis for this relief is as follows:

1. The Court has previously allowed the parties to file various pleadings and exhibits under seal. Further, the protective order entered herein provides for the filing of confidential information and documents under seal.

2. Portions of the Memorandum in Support of DuPont’s Second Motion to Compel contain information designated as Confidential or Restricted Confidential by at least one of the parties. In addition, an Appendix and Exhibits A-P contain and/or discuss information designated as Confidential or Restricted Confidential by Monsanto. Therefore, these portions of DuPont’s Memorandum in Support, and the Appendix Exhibits A-P thereto, should be sealed.

DuPont will also file a redacted version of its Memorandum in Support, without the Appendix and Exhibits A-P, as part of the public record.

WHEREFORE, DuPont respectfully requests that the Court enter an order allowing it to file under seal a complete, unredacted Memorandum in Support of DuPont's Second Motion to Compel, and the Appendix and Exhibits A-P thereto, under seal.

Dated: December 23, 2010

Respectfully submitted,

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Company and Pioneer Hi-Bred International, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2010, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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